REMARKS

The applicants wish to thank the Examiner for his examination of the present application and the office action of August 26, 2004. Please note that new claims 52-62 have been added and claims 8-13, 16, 22, 35, 39, 42-48 and 51 have been cancelled.

The applicants have replaced Fig. 2 in order to distinguish the system manager from the Ethernet switch by providing the system manager with a different reference numeral. Similarly the text of the application has been amended to correct this error.

Claim 4 has been corrected so that it does not reference itself, but rather depends from claim 3.

Claims 43-48 have been cancelled and claim 49 as amended is directed to a computer program product having computer code on a computer readable medium for use with a computer system. It is believed that the computer code is now on a tangible medium and therefore the section 101 rejection is overcome.

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The applicants would like to first point out that claim 1 has been amended along with all of the independent claims and that claim 1 requires changing selection of a link between frames based only on a directional command that is from a discrete set of directional commands wherein the link is determined based upon the position of the link relative to the link in the first frame. None of the references alone or in combination teach these limitations.

The reference to Cote (US 3003/0196174 01) is the only cited reference that teaches moving between links. In Cote, an HTTP element list is constructed of all

elements on the webpage. A user can then use the TAB key to navigate through the list.

A directional command from a set of discrete direction commands is not received by the

system described in Cote. A TAB command is simply not a directional command because

there is no direction associated with TAB. The user can only move through a list by using

the TAB command and the shift TAB command. The user of the system of Cote is

limited to traversing the links in the order that the Cote system defines and cannot

navigate the webpage in an order determined by the user. The Tab Command only allows

movement through a separate list that is unassociated with direction.

Even though the Cote reference allows for movement between frames (see

paragraph 37 and paragraph 41 and Fig. 10), the reference to Cote does not allow a user

to navigate through a Web page in a non-predetermined order. The Cote reference clearly

lacks the requirement of receiving a directional command from a discrete set of

directional commands for movement between links in a first frame and a link in a second

frame. None of the other references teach moving between links and frames therefore the

references alone or in combination fail to make obvious the independent claims as

amended.

The office action suggests that the Bates reference (U.S. 6,727,929) teaches the

limitation of "determining the location within the web browser window of each frame" of

claim 1. The reference to Bates is directed to differentiating "between windowing events

especially when the events occur in close proximity to two or more windowing

functions." See Col. 1 lines 58-60. In Bates, relative movement of a cursor is determined

and based upon this movement, it is checked to see if the movement is consistent with a

first windowing function. If it is inconsistent, the Bates reference checks to see if the

movement of the cursor is consistent with a second windowing function. Based upon the movement of the cursor, the proper windowing function is selected. This functionality does not determine a proximate frame from a known location within a first frame. The Bates reference does not teach measuring distances of frames from a known location nor determining the closest link within a proximate frame. All that Bates teaches is determining relative movement of a cursor.

Further, the Bates reference is preferably used with a pointing device that can move a cursor. See Col. 5 line 48-50 that states that the cursor "moves freely" around the screen and is "manipulated by a mouse or joystick or other device." In the present invention as claimed, a directional command is selected from a set of discrete directional commands that determines movement. With a discrete set of directional commands, a cursor cannot be manipulated to move freely around a screen. Movement is limited to a discrete number of directions. As a result, the Bates reference would not be combinable with the Cote reference since one receives movement input from a mouse and the other receives input from a tab key.

Further, the applicants would like to point out that the IBM reference is directed to providing a visual indicia of the frame in which the user is operating. In contrast the present invention as amended in claim 1 is directed to changing selection of a link within a first frame and selecting a link within a second frame. Newly added claims are directed to moving between frames with links and frames that do not contain links. The IBM reference does not teach moving between both frames and links within frames.

Further the IBM reference is used by the Office Action to show that a nearest frame is selected as the proximate frame based on a directional command. The IBM

reference does not suggest or teach that the directional command that is received is from a set of discrete directional commands as required by the amended claims nor is a nearest frame selected based on one of the discrete directional commands taught by the IBM reference. Thus, the IBM reference does not teach how to move between frames and links nor does it teach receiving a directional command selected from a set of discrete directional commands.

As the office action suggests, the Satterfield reference (U.S. 6,564,378) does teach using a remote control to change locations on a television screen and use of the remote control in a cable television system. However, the present invention teaches away from the scope of the Satterfield reference. The Satterfield reference operates with pre-determined content. The Satterfield reference is directed to control of a television channel guide that is in a fixed grid form. Each block in the grid is at a known location. In the Satterfield reference there is no reason to measure distances between elements because they are always known. Because the present invention operates with web-page content that has frames and links and links within frames at unknown locations relative to the screen, it is necessary to determine distance measurements. Therefore, the technique used in the Satterfield reference could not be combined with any of the previously mentioned references to form the inventions as claimed in the independent claims.

As previously stated, none of the references provided alone or in combination teaches moving from a first link within a frame to another frame or link based upon a directional command that is from a discrete set of directional commands. Further, aspects of the references make the combining of the references inappropriate. Specifically, Satterfield's fixed content does not require determining the closest link or the proximate

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frame, since the content is known and is in a fixed grid pattern. The Bates reference operates with a mouse which does not have a discrete set of directional commands. As a result, the combination with the reference to Satterfield which does use discrete directional commands is inappropriate. Additionally, the technique of Cote operates without using direction or position at all. Rather the Cote reference allows for moving through a list of links based upon use of the non-direction based Tab key. Adding the reception of a direction-based signal or determining the closest links or frames based upon position would be inappropriate.
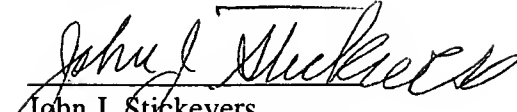
As a result, all of the independent claims: claims 1, 17, 29, 32, 49, 52, 54, 55, 58, 60 and 61 are allowable over the art of record. Further, each of the remaining dependent claims depends from an allowable independent claim and adds at least one additional limitation and are therefore, also allowable over the art of record.

It is believed that all of the claim rejections have been addressed and that the application is now in condition for allowance. Reconsideration of the claims and issuance of a notice of allowance are respectfully requested.

If any matter arises which may expedite issuance of a notice of allowance, the Examiner is requested to call the undersigned, at the telephone number given below.

It is believed that no extension is required for this application. If any additional fees are required for the timely consideration of this application, please charge deposit account number 19-4972.

Respectfully submitted,

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